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Attorneys for Defendants,
CITY OF STOCKTON et al

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

SHAWN BRYE

Plaintiff,

vs.

CITY OF STOCKTON AND STOCKTON
POLICE OFFICERS DOES 1-50

Defendants.

Case No. 2:23-CV-00343-KJM-CSK

**STIPULATION AND ORDER TO STAY
ALL PROCEEDINGS AND COURT
DEADLINES**

WHEREAS the parties have met and conferred by and through their respective counsel,
and hereby stipulate and request as follows:

WHEREAS, Plaintiff's Counsel, Stanley Goff, is currently receiving critical medical
care and housed in an intensive care unit due to an incident occurring on November 29, 2024;

WHEREAS, Mr. Goff will need to undergo an extensive recovery period following said
care;

WHEREAS, Mr. Goff requested Fulvio F. Cajina, Esq to specially appear and meet and
confer with counsel to stipulate to a stay of the litigation;

WHEREAS, Fulvio F. Cajina, Esq. is specially appearing for Mr. Goff in the above-captioned case as Mr. Goff recovers;

WHEREAS, Fulvio F. Cajina, Esq. notified defense counsel on December 2, 2024 regarding the seriousness of Mr. Goff's medical condition;

WHEREAS, defense counsel agreed to stipulate to a stay of litigation to allow for Mr. Goff's hospitalization and recuperation;

WHEREAS, said unforeseen circumstance constitutes good cause to stay all pending proceedings and deadlines in the above-captioned for a period of three (3) months;

NOW, THEREFORE, the Parties hereby stipulate, agree, and respectfully request that:

1. The Court stay the litigation, including all proceedings and upcoming deadlines, in all respects, for the next ninety (90) days in the above-captioned matter;
2. That the Court set a Case Management Conference in March 2025, per the availability of the Court, for a status update on this matter.
3. The Parties agree to provide the Court an updated joint case management statement seven (7) days in advance of said Case Management Conference with a status update and a proposed scheduling order for any deadlines impacted by this stay.

IT IS SO STIPULATED.

Respectfully submitted,

LAW OFFICE OF FULVIO F. CAJINA

Dated: December 3, 2024

/s/ Fulvio Cajina (as authorized 12/3/24)

FULVIO F. CAJINA, ESQ.

Specially Appearing for Plaintiff

Dated: December 3, 2024

MAYALL HURLEY, P.C.

/s/ Mark E. Berry (as authorized 12/3/24)

MARK E. BERRY, ESQ.

Attorneys for Defendants,

CITY OF STOCKTON et al

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED:

1. Finding good cause, this matter is stayed, including all proceedings and upcoming deadlines, in all respects, for the next ninety (90) days in light of Mr. Goff's medical situation;
2. A Case Management Conference is set for March 27, 2025 at 2:30 p.m. before the undersigned. The Parties are ordered to file a joint case management statement seven (7) days prior to the Case Management Conference wherein the Parties will provide the Court an update and propose an amended scheduling order for any deadlines impacted by this stay.

Dated: December 9, 2024.



UNITED STATES DISTRICT JUDGE